

1 *
2 BRENT L. RYMAN, ESQ. (#008648)
3 ERICKSON, THORPE & SWAINSTON, LTD.
4 99 West Arroyo Street
5 P.O. Box 3559
6 Reno, Nevada 89505
7 Telephone: (775) 786-3930
8 *Attorneys for Nye County Defendants*

9
10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE DISTRICT OF NEVADA

12 VASILI PLATUNOV, an individual and
13 EST.-ALFA K-9 SECURITY SERVICE
14 LLC,

15 Plaintiffs,

16 v.

Case No.: 2:18-cv-00917-GMN-PAL

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE MOTION
HEARING SCHEDULED FOR
MARCH 12, 2019**

17 NYE COUNTY, a political subdivision of
18 the State of Nevada, BOARD OF NYE
19 COUNTY COMMISSIONERS, ANGELA
20 BELLO, NYE COUNTY DISTRICT
21 ATTORNEY

22 Defendants.
23 _____/

24 COMES NOW, the parties, by and through their undersigned Attorneys of Record, and
25 hereby respectfully submit this Stipulation and Order to Continue Motion Hearing currently
26 set for March 12, 2019, due to a scheduling conflict for undersigned counsel for Defendants,
27 who will be out of the state on the scheduled date. This hearing involves the parties' Joint
28 Motion for Extension of Discovery and Related Deadlines (#23) (first request) filed
February 13, 2019, which was initially set for a hearing on March 4, 2019, via this Court's
Minute Order (#24) issued February 20, 2019.

1 Because counsel for Plaintiffs was unable to attend that date due to a host of required
 2 appearances in the Fifth Judicial District Court, Nye County, undersigned defense counsel
 3 agreed to a continuance and a stipulation with new requested dates was submitted. While the
 4 Court granted the stipulation on February 28, 2019, the Order (#26) set the hearing for a date
 5 not included in the stipulation. Unfortunately, undersigned counsel for Defendants will be
 6 out of the office with family for a long-planned vacation that next week, and therefore has
 7 requested that Plaintiffs' counsel stipulate, and begs the Court's indulgence to consider,
 8 another short continuance of the upcoming hearing.¹ The parties represent that Plaintiffs'
 9 counsel Thomas J. Gibson, Esq., and Defendant's counsel Brent L. Ryman, Esq., have
 10 available dates as follows:

11 Tuesday, March 26, 2019 (beginning at 2 p.m.)

12 Wednesday, March 27, 2019

13 Thursday, March 28, 2019

14 DATED this 7th day of March, 2019.

15 GIBSON LAW GROUP, PLLC..

16
 17 /s Thomas J. Gibson
 18 THOMAS J. GIBSON, ESQ. (#03995)
 19 2340 East Calvada Blvd., #5
 20 Pahrump, Nevada 89408
 Telephone (775) 209-1035
Attorneys for Plaintiffs

21 ///

22 ///

23 ///

24 _____

25 ¹. This stipulation would have been submitted immediately after the issuance of the
 26 Court's Order (#26) but for the undersigned's mistake in believing the new hearing was set for
 27 Tuesday, March 5, 2019, which all counsel discussed at Plaintiff's deposition shortly after
 28 receiving the CMECF notification. It was only the morning of March 5, 2019, as counsel
 prepared to exit the office to catch a plane for what he believed would be the hearing, that the
 mistake was noticed and the request to reschedule issued to Plaintiff's counsel and the
 Courtroom Clerk.

1 DATED this 7th day of March, 2019.

2 ERICKSON, THORPE & SWAINSTON, LTD.

3
4 /s/ Brent Ryman
5 BRENT L. RYMAN, ESQ. (#008648)
6 ERICKSON, THORPE & SWAINSTON, LTD.
7 99 West Arroyo Street
8 P.O. Box 3559
9 Reno, Nevada 89505
10 Telephone: (775) 786-3930
11 *Attorneys for the Nye County Defendants*

12 ///

13 **ORDER**

14 This matter having come before the Court upon the Stipulation of the parties, and good
15 cause appearing therefore,

16 IT IS HEREBY ORDERED that the hearing scheduled for the 12th day of March 2019 be
17 continued to the 26th day of March, 2019 at 2:00 p.m., or as soon thereafter as counsel may be
18 heard.

19 DATED this 8th day of March, 2019.

20
21 
22 UNITED STATES MAGISTRATE JUDGE
23
24
25
26
27
28

CERTIFICATE OF SERVICE

Pursuant to FRCP Rule 5, I certify that I am an employee of ERICKSON, THORPE & SWAINSTON, LTD. and that on this day I caused to be served a true and correct copy of the attached document by:

- ☐ U.S. Mail
- ☐ Facsimile Transmission
- ☐ Personal Service
- ☐ Messenger Service
- ☒ CMECF

addressed to the following:

THOMAS J. GIBSON, ESQ.
2340 East Calvada Blvd., #5
Pahrump, Nevada 89408
Telephone (775) 209-1035
Attorneys for Plaintiffs

DATED this 7th day of March, 2019.

/s/ Brent Ryman
Brent Ryman